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Counsel for Official Committee of Tort Claimants

IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION

– and –

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM)*

Bankruptcy Case
Case No.: 19-30088 (DM)

Chapter 11
(Lead Case)
(Jointly Administered)

**DECLARATION OF LARS H. FULLER
IN SUPPORT OF MOTION FOR
PROTECTIVE ORDER**

Date: June 26, 2019
Time: 9:30 a.m. PT
Place: United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

Objection Deadline: June 19, 2019

1 LARS H. FULLER, declares as follows under penalty of perjury:

2 I am an attorney at Baker & Hostetler LLP, counsel to the Official Committee of Tort
3 Claimants in the above-captioned chapter 11 cases of PG&E Corporation and Pacific Gas and
4 Electric Company. I have personal knowledge of the facts stated herein and as to those matters, I
5 believe them to be true. If called upon to testify, I could and would competently do so.

6 1. I make this declaration in support of the Motion for Protective Order (“**Motion**”).

7 2. I have personal knowledge of communications with counsel for the Debtors
8 regarding conferral over the relief sought in the Motion. The recitation in the Motion summarizing
9 those communications is true and accurate.

10 3. Attached hereto as **Exhibit 1** is a true and correct copy of the form “Stipulated
11 Protective Order for Standard Litigation” provided by the U.S. District Court for the Northern
12 District Court on its website (<https://www.cand.uscourts.gov/model-protective-orders>). Attached
13 hereto as **Exhibit 2** is a true and correct copy of the Stipulated Protective Order Between Debtor
14 and Official Committee of Unsecured Creditors entered on June 13, 2016 as Docket No. 202 in
15 Case No. 16-30063 (*In re Yellow Cab Cooperative, Inc.*).

16 I declare under penalty of perjury that the foregoing is true and correct.

17 Executed this 5th day of June 2019,

18
19 /s/ Lars H. Fuller
By: LARS H. FULLER